

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,
EMC CORPORATION, AND VMWARE,
INC.,

Defendants.

Case No. 6:20-cv-00485-ADA

JURY TRIAL DEMANDED

LETTERS OF REQUEST FOR FOREIGN DISCOVERY FROM INDIA

Defendants', Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc., (collectively "Defendants"), seek foreign discovery from a third party witness residing in India. Defendants have attached an Appendix with a Letter of Request which includes Document Requests and Deposition Topics. The chart below outlines the name of the witness Defendants seek foreign discovery from, the relevant case number, and the Patent at issue.

Appx.	Name of Witness Entity	Relevance of Witness/Entity	Case No.	U.S. Pat. No.
A	Harsha Nagesh	Named Inventor	6:20-cv-00485	7,636,309

Defendants respectfully request that the Court execute the Letter of Request attached as Appendix A. Defendants further request that, after the Court has signed the Letter of Request, the Clerk of this Court authenticate the Court's signature under the seal of this Court, and return the original signed and sealed executed Letter, and two certified copies of the signed and sealed executed Letter, to Defendants' counsel, Benjamin Hershkowitz, for delivery to the proper authority.

Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, indicated that it reserves the right to serve its own foreign discovery in the future.

Dated: November 6, 2020

By: /s/ Benjamin Hershkowitz

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on November 6, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ Benjamin Hershkowitz
Benjamin Hershkowitz